

## **Apostles Residents Association (ARA) response to Proposed Housing Provision policy as it affects the Apostles area.**

On 1 June 2020, we submitted to Merton Council a paper to assist in the formulation of the planned revised local Plan. We did this because of our concerns about the potential for our terraced houses to be split by developers into two small dwellings. Our fear was that this would gradually reduce housing stock which has proved itself ideal as small family units, albeit with some extension work. We were also concerned about the devastation such developments would make to the nature of our streets. We submit that the draft Local Plan fails adequately to address this issue. (I am attaching our earlier submission.)

There is nothing specific about housing policy in Chapter 7 Policy N3.4 of the draft Local Plan relating to Raynes Park, para 3.4.7. However the 'Justification' section indicates that an expectation of increase in dwelling numbers in Raynes Park will in part be through intensification. Given the existing housing mix in the area it is likely that any intensification will involve the conversion of two bedroomed terraced houses into two units neither of which is a 'family' home. The net gain will therefore be only a one bedroom dwelling.

The SHNA table projection to 2035 (Figure 4.3.1) in Chapter 14 'Housing Provision' makes clear that in the market sector there is no more than a 7% requirement for one bedroom dwellings across the whole borough. In the life of the current Local Plan the majority of new build dwellings built in the Raynes Park area have been one and two bedroom apartments, which is the inevitable consequence of developers seeking the maximum return on small sites in the market sector.

Whilst we accept that the Apostles area enjoys the benefit of being in the market sector for those that can afford to buy their own home, the risk is that the proposed policy will stifle the increase of 'family' homes that would otherwise be possible by extending two bedroom terraced houses typical of the area into three bedroom 'family' homes. The SHNA table indicates a requirement in the market sector of 70 to 73% for 'family' homes to 2035 which, given the scarcity of small and medium size parcels of land in the borough for redevelopment, appears unlikely to be achievable. Such sites should anyway be considered for affordable home developments if capable of supporting ten or more dwellings.

Whilst nobody who owns a two bedroom terraced house can be forced to expand it into a three bedroom 'family' home, the evidence from our attached report shows that a little over half of all houses in the Apostles are three bedroom 'family' homes. We estimate that close to 400 of these have been converted from two bedroom terraced houses and that c.70% of those were converted in the last 20 years or so. This is a windfall increase of 'family' homes in the Apostles alone of at least 300 units in that time period. This benefit is probably replicated in other parts of the borough with similar market sector terraced housing.

Given that the majority of market sector homes likely to be built up to 2035 will be on large sites with a considerable percentage of one and two bedroom apartments and the expected requirement for such units is a maximum of 30% in the SHNA, it appears that the conversion of two bedroom dwellings to three bedroom family homes, whilst not an overall net gain, would certainly contribute positively to predicted housing mix requirements for 'family' homes. We note that the only two larger development sites in the vicinity of the Apostles (the former Manuplastics site and The Rainbow Industrial Estate) with extant planning permissions (which have not yet been built) propose a total of 323 dwellings, 87% of which are one or two bedroom apartments. This substantially exceeds the requirement for non family homes across all sectors, not just the market sector.

It is therefore our view that the conversion of a two bedroom terraced house in the Apostles to a three bedroom 'family' home is preferable to conversion to two non family apartments with a net gain of a one bedroom apartment. However the only discouragement to the latter is as set out in the Table

H.4.1f, where, for sites offering 2 to 9 units, ‘**up to** an equivalent of 20% affordable housing provision’ is required as a financial contribution. If the contribution requested is negligible then clearly there is no disincentive to such conversions of two bedroom terraced houses into two non family apartments.

We believe that either the policy or the level of financial contribution should be reworded to clearly discourage such non family unit conversions.

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Chair  
Apostles Residents Association

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